

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 24-80116-CR-CANNON/McCabe**

**UNITED STATES OF AMERICA**

**vs.**

**RYAN WESLEY ROUTH,**

**Defendant.**

/

**GOVERNMENT’S NOTICE REGARDING *DAUBERT* AND  
PROPOSED DEFENSE EXPERT MICHAEL McCLAY**

The United States files this Notice advising the defense and the Court that it expects to file any motion relating to proposed defense expert Michael McClay after the deadline for the defense to provide any supplement to McClay’s disclosure based upon the “live-fire” exercise. The Court’s April 15 Order states that the defense must provide any disclosure relating to this test by May 30, and the Government may thereafter by June 9 file a motion challenging “such expert testimony.” (ECF 128:4). Because we understand that McClay will be performing this test, to avoid multiple motions and piecemeal litigation arising out of the same witness and basic subject matter, we plan to present objections regarding McClay – if we choose to present them – in a single motion covering all topics filed by June 9.

Respectfully submitted,

HAYDEN P. O’BYRNE  
UNITED STATES ATTORNEY

By: /s/ John Shipley  
John C. Shipley  
Florida Bar No. 69670  
Christopher B. Browne  
Florida Bar No. 91337

Maria K. Medetis Long  
Florida Bar No. 1012329  
Assistant United States Attorneys

U.S. Attorney's Office  
Southern District of Florida  
99 Northeast 4th Street, 8th Floor  
Miami, Florida 33132-2111  
Telephone: (305) 961-9111  
E-mail: John.Shipley@usdoj.gov

SUE BAI  
SUPERVISORY OFFICIAL PERFORMING THE  
DUTIES OF THE ASSISTANT ATTORNEY  
GENERAL FOR THE NATIONAL SECURITY  
DIVISION

By: /s/ James Donnelly  
James Donnelly, Trial Attorney  
Court ID No. A5503278  
Department of Justice, National Security Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
Telephone: (202) 514-0849

**CERTIFICATE OF SERVICE**

The Government filed the foregoing document with the Clerk of the Court using CM/ECF  
on April 29, 2025.

/s/ John C. Shipley  
Assistant United States Attorney